

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------------|---|--|
| UNITED STATES OF AMERICA |) | Criminal No. 24cr10375 |
| |) | |
| v. |) | Violations: |
| |) | |
| MELANDO STREETY, a/k/a "Prez," |) | <u>Count One: Sex Trafficking by Force, Fraud,</u> |
| |) | <u>or Coercion</u> |
| Defendant |) | (18 U.S.C. §§ 1591(a)(1), (b)(1)) |
| |) | |
| |) | <u>Counts Two–Six: Transporting a Person to</u> |
| |) | <u>Engage in Prostitution; Aiding and Abetting</u> |
| |) | (18 U.S.C. §§ 2421(a) and 2) |
| |) | |
| |) | <u>Sex Trafficking Forfeiture Allegation:</u> |
| |) | (18 U.S.C. § 1594(d)) |
| |) | |
| |) | <u>Transportation Forfeiture Allegation:</u> |
| |) | (18 U.S.C. §§ 981(a)(1)(C), 2428(a) and 28 |
| |) | U.S.C. § 2461(c)) |

INDICTMENT

COUNT ONE

Sex Trafficking by Force, Fraud or Coercion
(18 U.S.C. §§ 1591(a)(1), (b)(1))

The Grand Jury charges:

From in or around September 2023 through in or around December 2023, in Boston, in the District of Massachusetts, the District of Nevada, the District of Rhode Island, the Southern District of New York, and elsewhere, the defendant,

MELANDO STREETY, a/k/a "Prez,"

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means Victim 1, a person known to the Grand Jury, knowing

and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Victim 1 to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT TWO

Transporting a Person to Engage in Prostitution; Aiding and Abetting
(18 U.S.C. §§ 2421(a) and 2)

The Grand Jury further charges:

On or about September 13, 2023, in the District of Massachusetts, the District of Nevada, and elsewhere, the defendant,

MELANDO STREETY, a/k/a “Prez,”

did knowingly transport Victim 1 in interstate commerce, to wit, between Nevada and Massachusetts, with intent that Victim 1 engage in prostitution, and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421(a) and 2.

COUNT THREE

Transporting a Person to Engage in Prostitution; Aiding and Abetting
(18 U.S.C. §§ 2421(a) and 2)

The Grand Jury further charges:

On or about October 4, 2023, in the District of Massachusetts, the District of Rhode Island, and elsewhere, the defendant,

MELANDO STREETY, a/k/a “Prez,”

did knowingly transport Victim 1 in interstate commerce, to wit, between Massachusetts and Rhode Island, with intent that Victim 1 engage in prostitution, and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421(a) and 2.

COUNT FOUR

Transporting a Person to Engage in Prostitution; Aiding and Abetting
(18 U.S.C. §§ 2421(a) and 2)

The Grand Jury further charges:

On or about October 12, 2023, in the District of Massachusetts, the Southern District of New York, and elsewhere, the defendant,

MELANDO STREETY, a/k/a “Prez,”

did knowingly transport Victim 1 in interstate commerce, to wit, between Massachusetts and New York, with intent that Victim 1 engage in prostitution, and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421(a) and 2.

COUNT FIVE

Transporting a Person to Engage in Prostitution; Aiding and Abetting
(18 U.S.C. §§ 2421(a) and 2)

The Grand Jury further charges:

On or about October 15, 2023, in the District of Massachusetts, the Southern District of New York, and elsewhere, the defendant,

MELANDO STREETY, a/k/a “Prez,”

did knowingly transport Victim 1 in interstate commerce, to wit, between New York and Massachusetts, with intent that Victim 1 engage in prostitution, and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421(a) and 2.

COUNT SIX

Transporting a Person to Engage in Prostitution; Aiding and Abetting
(18 U.S.C. §§ 2421(a) and 2)

The Grand Jury further charges:

On or about October 26, 2023, in the District of Massachusetts, the Southern District of New York, and elsewhere, the defendant,

MELANDO STREETY, a/k/a “Prez,”

did knowingly transport Victim 1 in interstate commerce, to wit, between Massachusetts and New York, with intent that Victim 1 engage in prostitution, and in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2421(a) and 2.

SEX TRAFFICKING FORFEITURE ALLEGATION
(18 U.S.C. § 1594(d))

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1591, set forth in Count One, the defendant,

MELANDO STREETTY, a/k/a “Prez,”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property; and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense, and any property traceable to such property.

2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 1594(d), as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Section 1594(d).

TRANSPORTATION FOR PROSTITUTION FORFEITURE ALLEGATION
(18 U.S.C. §§ 981(a)(1)(C), 2428(a) and 28 U.S.C. § 2461(c))

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 2421, set forth in Counts Two through Six, the defendant,

MELANDO STREETY, a/k/a “Prez,”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a), and Title 28, United States Code, Section 2461(c), any property, real or personal, used or intended to be used to commit or to facilitate the commission of such offense; and, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Section 2428(a), and Title 28, United States Code, Section 2461(c), any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense.

2. If any of the property described in paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 2428(a), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 2428(a), and Title 28, United States Code, Section 2461(c).

TRUE BILL

Brian Jacobson
FOREPERSON

Brian A. Fogerty
BRIAN A. FOGERTY
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: December 12, 2024
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo
DEPUTY CLERK



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